

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**FILED**

**APR 02 2025**

**CLERK, U.S. DISTRICT COURT  
TEXAS EASTERN**

**JENNIFER RYAN,**

**Plaintiff,**

**v.**

**PAYPAL INC.,**

**Defendant.**

**CIVIL ACTION NO.: 4:22-cv-559**

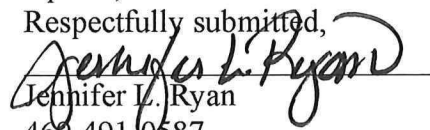
**JURY TRIAL DEMANDED**

**MEMORANDUM IN SUPPORT OF DEFAULT JUDGMENT DAMAGES**

Plaintiff Jennifer Ryan, pro se, requests default judgment against PayPal Inc. per Fed. R. Civ. P. 55(b), as PayPal failed to respond. Plaintiff seeks \$185M—\$50M economic, \$20M emotional, \$115M punitive—for the permanent destruction of her real estate, life coaching, and public commentary careers, as detailed in the Third Amended Complaint and Declaration (Exhibit AA). This claim is supported by attached Exhibits AA-111 to AA-118 (sales), C1 (leak, Dkt. #49), D (28+ articles, Dkt. #49), Q (jail costs, Dkt. #49), E (Fundly \$800/day, Dkt. #58), and additional exhibits to be provided: B (Fundly shut down), D-1 (search smear), D-2 (50+ reports), FF (Jenna Ryan Realty brand), GG (iHeartMedia), HH (network), II (client attacks), TT-1 to TT-6 (platform bans), UU (lost listings), VV-1 to 10 (agent attacks), WW-1 to 5 (client rejections), XX (yard sign stigma), YY (business scaling). Plaintiff requests a Rule 55(b)(2) hearing if needed to present further testimony and evidence.

April 2, 2025

Respectfully submitted,

  
Jennifer L. Ryan

469-491-0587

[jennaryanrealty@gmail.com](mailto:jennaryanrealty@gmail.com)

*Pro se Plaintiff*

**CERTIFICATE OF SERVICE**

I, Jennifer Ryan, certify that on April 2, 2025, I hand-delivered this Memorandum in Support of Default Judgment Damages, with exhibits, to the United States Courthouse, 7940 Preston Rd, Plano, TX 75024, for filing in Case No. 4:22-cv-559, and served it via CM/ECF to all counsel of record.

/s/ Jennifer L. Ryan